

From: [Thompson, Steve](#)
To: [Gray, David](#)
Cc: [Blevins, John](#); [Gilrein, Stephen](#); [Smith, Monica](#); [McQuiddy, David](#); [Broyles, Ragan](#); [Jones, John-L](#)
Subject: Answers to additional Clean Air Act questions re: Williams Olefins - Geismar
Date: Thursday, June 13, 2013 8:25:20 PM

David,
Please see the answers to your follow-up questions below. Please Let me know if you have additional questions.
Steve

Summary of Enforcement Actions in the last 5 years.

(The following summary of the Louisiana Dept of Environmental Quality's (LDEQ's) actions regarding Williams Olefins were obtained through reviewing information from LDEQ's Electronic Document Management System.)

LDEQ Enforcement:

3/26/09 - Settlement Agreement (Penalty \$4,500) between LDEQ and Williams Olefins to resolve the following violations:

- 2/18/07 release of 2600 lbs of propylene (Reportable Quantity or R.Q. is 100 lbs)
- 4/6/07 release of 47,810 lbs of ethylene (R.Q. is 100 lbs); 514 lbs propylene; and 12 lbs of 1,3-butadiene (R.Q. is 10 lbs).
- 2/1/07 release of 58 lbs of benzene (R.Q. is 10 lbs)
- 4/4/07 release of 36 lbs of benzene
- 7/16/07 release of 86 lbs of benzene
- Inappropriate sampling technique at the Steam Stripper observed during 11/28/07 inspection

11/15/10 - LDEQ issued a Compliance Order and Notice of Potential Penalty (CONOPP) to Williams Olefins regarding the following violations:

- 4/21/09 preventable release of 93 lbs of benzene.
- 9/18/08 release of 4,360 lbs of propylene
- 9/22/09 reported that new LDAR components had not been identified and monitored as required
- Settlement negotiations are on-going between the parties.

Why was facility inspected in Dec 2011?

The December 2011 inspection conducted by LDEQ at the facility appears to be a regularly scheduled inspection. The last 3 inspections conducted by LDEQ were 2 years apart and appear to be regularly scheduled Full Compliance Evaluations (FCEs) based upon LDEQ's Compliance Monitoring Strategy that requires inspections every other year at facilities that have Title V permits.

Status of EPA Leak Detection and Repair (LDAR) Case:

- May 2007 - EPA Region 6 conducted a Clean Air Act inspection.
- April 2009 - Case referred to the Department of Justice (DOJ) for 3 counts of CAA violations (LDAR).
- September 2009 - EPA received notice that DOJ declined to pursue the case.
- Early 2010 through June 2012 - EPA Region 6 asked for the case to be returned to allow for us to assess our administrative enforcement options. Case never returned.
- June 2012 - EPA Region 6 decided to close the case due to the pending statute of limitations on the 2007 LDAR claims and work with LDEQ to determine the need to reinspect for LDAR compliance.